UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

DATE: AUG 1 2016

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Industrial Container Services – OH, LLC, Gahanna, Ohio

FROM: Charles Hall, Environmental Engineer C. Hall
AECAB (MN/OH)

THRU: Brian Dickens, Section Chief
AECAB (MN/OH)

TO: File, Industrial Container Services – OH, LLC, Gahanna, Ohio

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BASIC INFORMATION

Facility Name: Industrial Container Services –OH, LLC, Gahanna, Ohio

Facility Location: 1385 Blatt Blvd., Gahanna, Ohio

Date of Inspection: 13 July 2016

Lead Inspector: Charles Hall, Environmental Engineer

Other Attendees:
1. Ron Grannan, Facility Manager
2. Brian Grannan, Senior Engineer

Purpose of Inspection: steel drum re-conditioner inspection

Facility Type: steel drum re-conditioner

Arrival Time: 09:05 hrs EDT

Departure Time: 13:35 hrs EDT

Inspection Type:
☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Credentials Presented
☒ CBI warning to facility provided

The following information was obtained verbally from **ATTENDEE(S)**, unless otherwise noted.

Process Description: ICS reconditions 55-gallon drums on two process lines: an open head line and a closed head line. During the unloading step, ICS determines whether each drum is RCRA empty by feeling the weight of the drum and looking at whether a drum rolls evenly. ICS returns non-empty drums to the customer that sent the drum. On the open head line, ICS removes the drum lid; turns the barrel upside down; puts the lid on top of the overturned drum; sends the barrel through a furnace to remove the paint from all surfaces and any residual contents of the drum and lid; shot blasts the drums and lids; and paints the drums and lids in separate painting booths. The furnace entrance is inside a building. The furnace exit is outside.

ICS controls the emissions from the drum furnace with a thermal oxidizer. On the closed head line, ICS uses a caustic solution to wash the internal surfaces of the drum; shot blasts the exterior to remove the old paint; and paints the drums. ICS collects emissions from the painting booths to a common regenerative thermal oxidizer. If the RTO temperature drops below its set point, the painting booths are disabled.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations: I observed particulate emissions exiting the outlet end of the furnace. The furnace exit has a rectangular shape. The opening is large enough to allow a 55-gallon drum to exit the furnace. The top of the exit is roughly 8 to 9 feet above the ground. At the time of the inspection, the 1-minute, 5-minute, and 1-hour furnace entrance differential pressures were -0.0160 inches of water, and the 1-minute, 5-minute, and 1-hour furnace exit differential pressures were -0.0159, -0.0146, and -0.0144 inches of water ("H_2O), respectively. The thermal oxidizer temperature, which controls VOC emissions from the drum furnace, was 1682 degrees Fahrenheit. The 1-hour carbon monoxide concentration was 0.88 parts per million by volume. Table 1 summarizes the differential pressure data for the three painting sources.

Table 1. Differential Pressure data for Painting Sources at ICS

Source Number	Description	Location	Differential Pressure
K001	Interior Drum Lining	Entrance	-0.021 "H_2O
K001	Interior Drum Lining	Exit	-0.008 "H_2O
K002	Exterior Drum Painting	Closed Head Booth	-0.012 "H_2O
K002	Exterior Drum Painting	Open Head Booth	-0.013 "H_2O
K002	Exterior Drum Painting	Oven Exit	-0.019 "H_2O
K003	Drum Lid Painting/Lining	Lining	-0.013 "H_2O
K003	Drum Lid Painting/Lining	Painting	-0.029 "H_2O

The differential pressures across the baghouses were 6.7"H_2O for the Tum Blaster, 2.0"H_2O for the Horizontal Shot Blaster, and 6.4"H_2O for the 10-Wheel Shotblaster.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

- Emission calculations from June 2016. The spreadsheet includes the usage of each paint, lining, and clean-up material on each day of June 2016, the VOC content in pounds per gallon, and the pound per hour emission rate for paints, linings, and clean-up materials.
- Example records of paint, lining, and clean-up material shipments.

CLOSING CONFERENCE

Requested Documents:
- Emission calculations example.
- Process flow diagram for the Open Head and Closed Head Lines.
- Summary of each stack test report for the RTO and each baghouse.

Concerns: I stated that I had observed particulate emissions exiting the outlet end of the furnace. I noted that I did not know at the time whether an emission standard applied.

SIGNATURES

Lead Inspector: Charles Hall Date: 27 July 2016

Section Chief: Brian Dietsch Date: 8/1/16